

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LUIGI WARREN,

Plaintiff,

vs.

THE CHILDREN'S HOSPITAL CORP.,

Defendant

Civ. A. No. 17-12472-DLC

DEFENDANT'S ASSENTED-TO MOTION FOR AN EXTENSION OF TIME

The defendant, The Children's Hospital Corporation, moves for an extension of time to May 18, 2020 to oppose the plaintiff's motion for leave to amend his complaint. In support of this motion, the defendant states as follows.

1. On April 9, 2020, the undersigned counsel visited the emergency room for a non-Covid-19 related health problem.
2. Because of the heightened risk of infection in a hospital, counsel has been advised by his medical professionals to self-quarantine at home for 14 days.
3. In order to complete the opposition to the plaintiff's motion, counsel needs access to documents that are only in the paper case files. But those files are stored off-site, and counsel will not have access to them until the 14-day self-quarantine period has ended.
4. The defendant submits that these circumstances constitute good cause for this motion.

For these reasons, the defendant respectfully requests that the Court grant this motion. The plaintiff has assented to the relief sought herein.

Respectfully submitted,

THE CHILDREN'S HOSPITAL CORP.

By its attorneys:

/s/ Theodore J. Folkman

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